

### **REMARKS**

Upon entry of this Response, claims 1, 2, 5-8, 11-14 and 17-24 remain pending in the present application. Applicant requests reconsideration of the pending claims in view of the following remarks.

In item 6 of the Office Action, claim 1-2, 5-8, 11-14, and 17-24 have been rejected under 35 U.S.C. §103(a) as being unpatentable over US Patent 5,999,664 issued to Mahoney (hereafter "Mahoney") and in view of US Patent 5,995,996 issued to Venable (hereafter "Venable"). A prima facie case of obviousness is established only when the prior art teaches or suggests all of the elements of the claims. MPEP § 2143.03, In re Rijckaert, 9 F.3d 1531, 28 U.S.P.Q2d 1955, 1956 (Fed. Cir. 1993). For the reasons that follow, Applicant asserts that the cited combination of Mahoney and Venable fails to show or suggest all of the elements of claims 1-2, 5-8, 11-14, and 17-24. Accordingly, for the reasons that follow, Applicant respectfully requests that the rejection of claims 1-2, 5-8, 11-14, and 17-24 be withdrawn.

Previously amended claim 1 includes the following element:

"a processing pipeline identifier configured to identify a processing pipeline to process each of the regions comprising one of the predefined data types selected in the selection interface, the processing pipeline identifier identifying the processing pipeline to process each of the regions based upon the predefined data type of each of the regions, respectively, and based upon a predetermined destination application."

With respect to this element, the Office Action states:

"Mahoney fails to explicitly disclose: *identifying a processing pipeline to process each of the regions comprising one of the predefined data types selected in the selection interface, wherein the processing pipeline is identified to process each of the regions based upon the predefined data type of each of the regions, respectively, and based upon a predetermined destination application.* However, Venable teaches the invoking or identifying of a document processing pipeline for processing a document as selected by an application program (col. 8, lines 46--col. 9, line 67). However, it would have been obvious to a person of ordinary skill in the art at the time of the invention to have combined the teachings of Mahoney, and Venable, and have identified the pipeline, because this would provide an efficient processing method of large data, such as that taught by Mahoney, and minimize the processing overhead as taught by Venable (col. 3, lines 62—col. 4, line 67)." (Office Action, page 3).

Applicant respectfully disagrees. As set forth in claim 1, the processing pipeline is identified to process **each of the regions comprising one of the predefined data**

**types selected in the selection interface.** In this respect, a processing pipeline is selected to process each region that is made up of a data type selected in the selection interface. Furthermore, a processing pipeline is identified for **each region** based upon the data type for the respective region and based upon a predetermined destination application for the data resulting from the processing of the respective region by the respective processing pipeline. In this respect, different regions within a document that are made up of different data types and/or that are to be applied to different destination applications may be processed by different processing pipelines, depending upon the identification process undertaken by the processing pipeline identifier.

Venable does not show or suggest the identification of a processing pipeline as set forth in claim 1. Rather, Venable discusses the creation of data processing pipelines based upon the needs of a particular host application. In this respect, Venable states:

"When the host application means 50 determines that it needs processed data from the data source 66, it creates and invokes the data processing pipeline 80. The host application means 50 thus includes an instantiating means 52 and an invoking means 54.

To create the pipeline 80, the instantiating means 52 accesses the library means 10 to obtain one of the uninitialized functions, and creates an instantiated function or task that is stored in a block of memory. The instantiated function, or task, is linked to the host application means 50 or another previously created task. If the task is linked to the host application means, it is the last task 60. If the task is linked to another task, and another task is linked to it, it is an intermediate task 62. If the task is linked to another task, and obtains data from the data source means 66, or generates data itself, it is the first task 64." (Column 8, lines 45-61).

As stated above, the "last task" is linked to the host application that creates the pipeline and the intermediate and first tasks are linked to the last task. Thus, ultimately, all of the tasks are linked to the "host application". The first task is configured to obtain data from a data source or generate the data itself. In this manner, the pipelines are not selected from among a number of possible pipelines based upon a data type for a particular region or based upon a destination application to which the output data is to be applied.

Also, since the host application of Venable directs the creation of the pipelines, is the only application interfacing therewith, and receives the data output from the pipeline, there is no selection of a pipeline based upon a predefined

destination application as claimed in claim 1. In this respect, Venable teaches away from the concept of selecting a pipeline based upon a destination application as it teaches the creation of a pipeline as an extension of the host application itself.

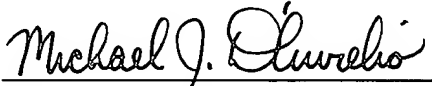
Furthermore, Venable does not teach identifying a separate pipeline for each of the regions in a document based upon both the data type of the respective region and upon a predetermined destination application as set for in claim 1.

Accordingly, Applicant respectfully requests that the rejection of previously amended claim 1 be withdrawn, and that the rejection of claims 2, 5, 6, 19 and 22 be withdrawn as depending ultimately from claim 1. Also, independent claims 7 and 13 include subject matter similar in scope with that of claim 1. Accordingly, Applicant requests that the rejection of claims 7 and 13 be withdrawn. Also, Applicant requests that the rejection of claims 8, 11, 12, 20, and 23 be withdrawn as depending ultimately from claim 7, and that the rejection of claims 14, 17, 18, 21 and 24 be withdrawn as depending ultimately from claim 13.

### CONCLUSION

Applicant respectfully requests that all outstanding objections and rejections be withdrawn and that this application and all presently pending claims be allowed to issue. If the Examiner has any questions or comments regarding Applicant's response, the Examiner is encouraged to telephone Applicant's undersigned counsel.

Respectfully submitted,

  
Michael J. D'Aurelio  
Reg. No. 40,977

D'Aurelio & Mathews, LLC  
96 Church Street  
Chagrin Falls, Ohio 44022  
Phone: (440) 729-7450  
Fax: (440) 729-7465